



1 CASE: AMOS v. THE LAMPO GROUP, ET AL.

2 DATE: JUNE 21, 2023

3 WITNESS: DAVID RAMSEY

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6 IMPORTANT NOTICE

7 PLEASE READ BEFORE USING ROUGH DRAFT

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9 WORKING WITH ROUGH DRAFTS

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15 transcript, understand that if we choose to use the
16 rough draft, we are doing so with the understanding
17 that the rough draft is an uncertified copy.

18 We further agree not to share, give, copy,
19 scan, fax, or in any way distribute this realtime
20 rough draft in any form (written or computerized) to
21 any party; however, our own experts, co-counsel, and
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1 REPORTER'S NOTE

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3 Since this transcript is in rough draft
4 form, please be aware that there may be
5 discrepancies regarding page and line number when
6 comparing the rough draft and final transcript.

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8 Also, please be aware that the realtime
9 screen and the uncertified rough draft transcript
10 may contain untranslated steno, reporter's notes, or
11 nonsensical word combinations. All such entries
12 will be corrected on the final, certified
13 transcript.

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8 on the record. We never went off, I guess.

9 BY MR. STREET:

10 Q. Are you aware of management at any level at

11 Ramsey making inappropriate jokes about homosexuals?

12 A. No.

13 Q. Are you aware of any management at Ramsey

14 stating that people should keep their distance from

15 gays?

16 A. No. I didn't know Brad Amos was gay.

17 MR. STREET: 736. That's not the court

18 number, is it?

19 MS. SANDERS: No.

20 MS. IRWIN: I think it is.

21 MR. STREET: This is Jon. Yes. Okay.

22 That's no problem. We can get it done. Okay.

23 Okay. That would be great. I'll put you on

24 speaker.

25 MS. SANDERS: Is that -- oh. Good.

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1 THE COURT: Hello, this is Judge Holmes.

2 MR. STREET: Good afternoon,

3 Judge Holmes. This is Jonathan Street. I've got
4 Leslie Sanders on the call as well.

5 MS. SANDERS: Good afternoon, Your
6 Honor.

7 THE COURT: Good afternoon.

8 MR. STREET: We're sorry to bother you.
9 We're actually here in a deposition in this Ramsey
10 case that I know you love us calling about, and it's
11 actually the deposition Mr. Ramsey and there's a --

12 THE COURT: Give me the case number --
13 give me the case number again.

14 MR. STREET: Yes. 21-CV-00923.

15 THE COURT: Okay. Go ahead and tell me
16 what the issue is.

17 MR. STREET: A couple things. This is a
18 religious discrimination lawsuit, Your Honor, and
19 we're asking about a policy at Ramsey which says
20 that the -- and I'm sure Ms. -- Ms. -- I'll give
21 Ms. Sanders a chance to set out her case, but our
22 position is there's a policy that says that they
23 expect employees to follow traditional
24 Judeo-Christian values, and there are certain things
25 we asked about, such as gay marriage and abortion



1 and things like that, whether -- whether employees
2 would be fired for those things under this policy,
3 and those are some of the things that they've
4 refused to answer, as well as a -- a --
5 Julie Anne Stamps is apparently another lawsuit that
6 was filed, and I asked about the allegations she
7 made, and they refused to tell me that as well.

8 Is there anything else?

9 MS. SANDERS: Well, Your Honor,
10 actually, he did answer the questions about gay
11 marriage. The only things that we've objected to so
12 far is, under Rule 30(d), we objected on the basis
13 of bad faith for embarrassment, annoyance, and
14 oppression of the witness when he asked questions
15 about pending lawsuit -- O'Connor is the name of
16 that lawsuit. And then the only thing we objected
17 to with respect to the religious claims were he
18 asked Mr. Ramsey his views on abortion, and we don't
19 think that that has anything to do with this
20 lawsuit. And certainly asking about the O'Connor
21 case prejudic- -- is prejudicial and has no
22 relevancy here. O'Connor is not a religious

23 discrimination case.

24 With respect to --

25 THE COURT: Well, and --

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1 MS. SANDERS: I'm sorry, Your Honor.

2 THE COURT: I'm sorry.

3 MS. SANDERS: No, that' -- that's okay.

4 With respect to Julie Anne Stamps, the

5 witness did answer, and he said it's a matter of

6 public record. He referred to the public record.

7 THE COURT: All right. Let me sort of

8 break these down and -- and see if I can figure out

9 exactly what the issues were.

10 The deponent is not permitted to not

11 answer a question just because it's objectionable.

12 The lawyer can pose an objection, but no speaking

13 objections, so not because -- if you think it's

14 harassment or -- you can object to the form of the

15 question, and then the deponent must go ahead and

16 answer the question, and the objections will be

17 resolved either at some later date by the -- an

18 appropriate filing, but was there actually a refusal
19 to answer a question?

20 MS. SANDERS: Your Honor, we moved
21 for -- yes, Your Honor. We stated that we would
22 move for a protective order on the pending lawsuits
23 and with respect to Mr. Ramsey's view on abortion.

24 MR. STREET: Your Honor, if I may, I --
25 it's not so much we're asking Mr. Ramsey his

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1 personal views. We're asking under the policy here
2 that says they must live by traditional
3 Judeo-Christian values if they would be punished or
4 fired if they found out an employee had an abortion.

5 MS. SANDERS: And, Your Honor, our
6 position is that that's in bad faith because it's
7 not related to this lawsuit in any way, and that's
8 what we -- we -- I told Mr. Street that we would
9 seek a protective order this evening on those
10 issues, and it's a fairly narrow group of issues.

11 THE COURT: On what basis, Ms. Goff --
12 under what rule does a deponent have a right not to

13 answer a question because they intend to seek a
14 protective order? I'm looking for the rule on
15 depositions, and I think -- and I'm going to find
16 the answer before I --

17 MS. SANDERS: It's -- Your Honor,
18 it's --

19 THE COURT: -- talk any more, but --

20 MS. SANDERS: It's Rule --

21 THE COURT: -- generally --

22 MS. SANDERS: -- Rule 30(d) under the
23 Federal Rules of Civil Procedure.

24 THE COURT: Rule 30(b), as in boy?

25 MS. SANDERS: D. No, D, as in dog.

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1 Rule -- Rule 30(d) restates Rule 26(c), the basis
2 for a protective order as set forth in Rule 26(c).
3 Rule 30(d) is specific to a deposition. And the
4 basis if it's -- is if the question is asked in bad
5 faith and if it's asked for the purpose of
6 embarrassment, annoyance, or oppression of the
7 witness, and our position is that there's no basis

8 to ask Mr. Ramsey about abortion in this case, and
9 there's no basis to ask him about lawsuits that
10 are -- particularly that are pending. And so we --
11 we would move for a protective order on those
12 issues. And -- and, Your Honor, we would -- our
13 intent was to brief that this evening and provide
14 that to the Court.

15 MR. STREET: Your Honor --

16 THE COURT: What was the specific
17 question that was asked, Mr. Street? Can you have
18 the court reporter read the question to me?

19 MR. STREET: Yes, if you'll give us a
20 second, Your Honor, to have her pull it up.

21 THE REPORTER: I'll have to search for a
22 specific term.

23 MS. SANDERS: Abortion.

24 MR. STREET: Abortion.

25 Oh, and, Your Honor, while we're

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1 looking, one other issue was --

2 MS. SANDERS: Jon, I'm sorry. I'm sorry

3 to interrupt you, but can she -- it's going to be
4 hard for her to look that up and type what you're
5 saying.

6 THE COURT: Right.

7 MR. STREET: Yes. I'm sorry. You're
8 right.

9 THE COURT: Don't talk any more until we
10 get that.

11 MR. STREET: You're right. I apologize.

12 MS. SANDERS: That's okay.

13 THE REPORTER: The question is "What
14 about an employee who got an abortion," and
15 Ms. Sanders objected. Mr. Street said, "You can
16 answer." And the answer was "I'm not going to
17 answer questions that are not relevant to the -- I'm
18 done with you setting up stuff for the Tennessean,
19 James."

20 MR. STREET: And he was referring to me
21 as James, Your Honor. I'm Jon.

22 MS. SANDERS: Your Honor, that was --
23 that was the question on abortion. Then I objected
24 on the record to that being a question in bad faith
25 under Rule 30(d). And then --



1 THE COURT: Well, I need to hear the --
2 a question or two before that, because if it is, in
3 fact, a question about the Ramsey group policies,
4 then that's a different -- that is a different
5 consideration than if it is a question about
6 Mr. Ramsey's personal opinions or personal positions
7 on whether an employee got an abortion, so it may be
8 more difficult for me to make a ruling over the
9 phone because I need to see the entire string of
10 questions that led up to that question, but I'm
11 going to tell you both now that if Mr. Street is --
12 has correctly described that this was a string of
13 questions that dealt with the company's policies,
14 Mr. Ramsey's going to have to answer that question
15 at some point. Not about his personal beliefs or
16 personal policies or personal opinions, but he is
17 going to have to answer about the company's
18 policies. But I can't tell from that specific
19 question, "What about an employee who got an
20 abortion?" That gives me no context. I don't know
21 what the "what about" is.

22 MS. SANDERS: Your Honor, with respect

23 to the pending lawsuit in O'Connor, it's -- we're
24 referring to it as the O'Connor lawsuit. I
25 apologize, Your Honor. I don't have that case

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1 number in front of me at this deposition, but we
2 recently in a case -- you know, Judge Trauger
3 specifically said that asking questions about a
4 pending lawsuit that aren't related to this lawsuit
5 are prejudicial, and so we would also move for a
6 protective order for the questions that are related
7 to the O'Connor lawsuit.

8 Would you -- would you like for us to
9 also brief that this evening?

10 THE COURT: Yes, but -- but let me just
11 give you this guidance. I'm -- I would have to see
12 Judge Trauger's decision, because I also have some
13 decisions where questions about a prior lawsuit can
14 be relevant, and they are not in and of themselves
15 prejudicial.

16 On the other hand, if that is a pending
17 lawsuit and all that's being asked is about details

18 of matters that are public record, there's no reason
19 that Mr. Street cannot obtain that information
20 through the public record.

21 What was the nature of the questions
22 that were being asked?

23 MR. STREET: I mentioned an employee's
24 name who had apparently filed a lawsuit, and I asked
25 what allegations she had made, and then that was,

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1 "We're not going to tell you."

2 MS. SANDERS: No, Jon, that was -- that
3 was Ms. Stamps.

4 MR. STREET: Ms. Stamps.

5 MS. SANDERS: I'm referring to O'Connor.

6 MR. STREET: Okay.

7 MS. SANDERS: Yeah.

8 MR. STREET: Well, then -- I guess --
9 and I'd have -- Your Honor, I'd need to go back and
10 look at exactly what the questions are. Your Honor,
11 if I just suggest -- I mean, it sounds like Your
12 Honor, as well, would like to see more of the actual

13 transcript of what we've done so far before making
14 your decision, and the problem is we have a
15 discovery deadline of next Friday, I believe, so if
16 we do brief -- if we do need to get a transcript and
17 brief this out, we would like to have, you know, as
18 part of the order that we can take this -- the
19 remainder of this one deposition on these issues
20 only after the discovery deadline if it takes that
21 long to rule on it.

22 THE COURT: Well, I'm going to let
23 you -- if I determine that these are --

24 MR. STREET: Okay.

25 THE COURT: -- appropriate areas of

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1 inquiry, I'm going to let you finish Mr. Ramsey's
2 deposition, and he'll have to appear again and
3 finish his deposition.

4 Are you planning on filing a motion
5 tomorrow, Ms. Sanders?

6 MS. SANDERS: Yes, Your Honor. We'll
7 file it as soon as practical. Of course, that --

8 we'll need to get with the court reporter to see how
9 quickly we can do that. My -- my intent, Your
10 Honor, when Mr. Street asked the questions was to
11 file it this evening, but I would have to file it
12 based on -- on my notes of what was asked in the
13 deposition as opposed to --

14 THE COURT: No, I want to see at least a
15 rough transcript. You-all can get a rough
16 transcript from the court reporter, what we used to
17 call a dirty ASCII, but that may not be the correct
18 description anymore, and you can see if you think
19 that will be sufficient rather than an official
20 transcript. I -- because I'm not so worried about,
21 you know, whether a word is misspelled as I am just
22 understanding the context of the line of
23 questioning. So that's what you-all should do, is
24 get the rough transcript from the court reporter
25 tonight and then make a determination about whether

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1 there's some more formal transcript that needs to be
2 finalized, but knowing that -- my preference is that

3 you get me something sooner rather than later.

4 THE WITNESS: Yes, Your Honor.

5 THE COURT: So don't -- don't delay this
6 because, you know, the -- the court reporter's rough
7 transcript misspells somebody's name or -- or
8 there's a sentence structure that is awkward or
9 something of that nature. I just need it for the
10 gist of the context to these issues.

11 And then I'm going to give the
12 plaintiff -- how much time do you want to respond to
13 this, Mr. Street? And you need to -- if you're
14 going to err on anything, err on the side of asking
15 for too few days than too many days.

16 MR. STREET: Five days.

17 THE COURT: Yes. Five days.

18 MS. SANDERS: Your Honor, this is --
19 this is Ms. Sanders. If -- Mr. Street and I need to
20 confer, because there may be additional questions,
21 so I don't want Your Honor to have to see this
22 again. So as we confer, if he gets into topics
23 that, in the O'Connor lawsuit, are marked as
24 attorneys' eyes only, may we mark that in this case
25 for the time being while this is pending? That's,



1 by the way, not in our confidentiality order in this
2 case. There's no attorneys' eyes only designation,
3 but the matters that I believe he was getting into
4 in O'Connor were marked attorneys' eyes only, so may
5 we mark that at least temporarily attorneys' eyes
6 only in this case?

7 THE COURT: Yes.

8 MS. SANDERS: Thank you, Your Honor.

9 THE COURT: How many pages do you think
10 you're going to need for this motion, Ms. Sanders?

11 MS. SANDERS: Your Honor, it's fairly
12 straightforward. I would think now no more than
13 five. Probably less, but it depends on what else
14 Mr. Street asks.

15 THE COURT: I'm going to say 10 pages
16 for the motion, 10 pages for the reply -- I'm sorry,
17 10 pages for the response, and then a reply within
18 two days of no more than three pages.

19 MS. SANDERS: Thank you, Your Honor.

20 THE COURT: So I'll go ahead and enter
21 an order about this conversation.

22 Anything else that we need to address,

23 then?

24 MR. STREET: Not that I can think of,

25 Your Honor.

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1 MS. SANDERS: No. Thank you, Your

2 Honor.

3 THE COURT: All right. Thank you all.

4 MR. STREET: Thank you.

5 All right.

6 MS. SANDERS: I think for efficiency

7 purposes -- are we still on the record?

8 THE REPORTER: (Nodding head.)

9 MS. SANDERS: Okay. I think for

10 efficiency purposes, we should go ahead and confer

11 and see what else you're going to ask, if there is

12 anything else.

13 MR. STREET: Well, I mean, I guess a lot

14 would depend on what his answers are to the ones

15 that we don't have.

16 MS. SANDERS: Sure, but we can talk

17 about topics.

18 Are there any topics other than
19 O'Connor -- I think -- I mean, you asked -- I think
20 you got his full answer on the core value other than
21 abortion.

22 MR. STREET: Can we do this? I mean --
23 okay. Well, no, we can't do that on the record.

24 MS. SANDERS: I just want us to confer
25 and see what we can work out today.

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1 MR. STREET: Right. I agree.

2 MS. SANDERS: Yeah.

3 MR. STREET: I mean, those are the --
4 the abortion string of questions also, but, I mean,
5 it's not going to be just that. It's -- you know,
6 it's maybe other specific things that would be
7 against what they consider to be traditional
8 Judeo-Christian values, as well --

9 MS. SANDERS: I under- -- yeah.

10 MR. STREET: -- and -- that you feel
11 like it's -- again --

12 MS. SANDERS: I understand that. I

13 think he's answered that. That's what I'm saying.

14 There was quite a bit of testimony about that.

15 MR. STREET: Okay. I don't think he
16 did, so I think that's the one that we're going to
17 have to fix -- you know, leave open.

18 MS. SANDERS: So why don't we go
19 ahead -- do you want to go ahead and finish with
20 whatever you're asking and then maybe we can take a
21 break and I can take a look at the rules, see what
22 else you get into, and then we can come back and
23 confer before he has to leave at 4:30? Does that
24 sound okay?

25 MR. STREET: We're not going to have

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1 time for 4:30 now.

2 MS. SANDERS: Well, we might. I mean,
3 just keep -- keep going.

4 MR. STREET: So do you want me to ask
5 these questions about abortion and whatnot?

6 MS. SANDERS: Are there any questions
7 other than these? Are these your last -- is this

8 your last area?

9 MR. STREET: Oh. I had probably a few

10 more, but --

11 MS. SANDERS: Do you want to just keep

12 going?

13 MR. STREET: Yeah, we can or --

14 MS. SANDERS: Okay.

15 MR. STREET: If we're going to come --

16 well, we don't -- that's the thing. We don't know

17 if we're coming back or not.

18 MS. SANDERS: Yeah. Why don't you just

19 keep going and we'll see?

20 MR. STREET: Okay.

21 MS. SANDERS: Yeah.

22 MR. CORTEZ: We can confer --

23 MR. SANDERS: Yeah. Right.

24 MR. STREET: You can -- say what now?

25 MS. SANDERS: Well, we can con- -- we

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1 can confer at 4:30.

2 MR. STREET: Yes. Mr. Ramsey's the

3 only --

4 MS. SANDERS: That's what we're saying.

5 He can keep going.

6 MR. STREET: Yeah. I mean -- yeah. I

7 don't want to have to come to your office, you won't

8 have to come to mine after today.

9 MS. SANDERS: Yeah. That's what I mean.

10 Yeah. And we've got a court reporter, so...

11 MR. STREET: Okay. Fine. I -- other

12 than those issues, I don't have a whole lot more --

13 MS. SANDERS: Okay.

14 MR. STREET: -- but while we --

15 since it's a good break, can I take a little

16 restroom break, if that's okay?

17 MS. SANDERS: Sure. Can we go pretty

18 fast? Maybe come back in four minutes?

19 MR. STREET: Yeah, we'll come back in

20 four minutes.

21 MS. SANDERS: All right. Great.

22 THE VIDEOGRAPHER: Going off the record

23 at 3:56 p.m.

24 (Short break.)

25 THE VIDEOGRAPHER: We are back on the



1 record at 4:02 p.m.

2 MS. SANDERS: Jon, based on the call
3 with Judge Holmes, we are going to go ahead and -- I
4 think you should go ahead and ask your questions
5 about the one -- the ones that were related to the
6 policy, okay? And then -- but we're not going to
7 answer questions about the O'Connor lawsuit. The
8 pending lawsuit. So I'll do my protective order on
9 the O'Connor --

10 MR. STREET: And Stamps?

11 MS. SANDERS: Ask your questions about
12 Stamps, because Stamps -- Stamps is over, so -- just
13 ask your questions and -- I'd say go ahead and ask
14 those.

15 MR. STREET: Mr. Ramsey's going to
16 answer?

17 MS. SANDERS: Assuming that it's not
18 something that's a part of this other pending
19 lawsuit.

20 MR. STREET: Okay. Okay. Give me a
21 second, then.

22 MS. SANDERS: Sure.